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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 United States of America,
12 Plaintiff,
13 v.
14 Francisco Javier Mares,
15 Defendant.

Case No. 2:20-cr-018-JCM-EJY-2
**Joint Stipulation Regarding a
Reduction in Sentence**

16
17 In compliance with Second Amended General Order 2023-09, the parties,
18 Jason M. Frierson, United States Attorney, and Jim W. Fang, Assistant United
19 States Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Madeline S. Lal, Assistant Federal Public Defender,
21 counsel for Francisco Javier Mares, file this Joint Stipulation.

22 The parties state as follows:

23 1. Undersigned counsel and government counsel have determined that
24 Mr. Mares qualifies for a sentence reduction under United States Sentencing
25 Guidelines Amendment 821 and have reached an agreement regarding a proposed
26 sentencing reduction.

1 2. Defense counsel has spoken to the defendant. The defendant
2 consents to the proposed sentencing reduction detailed below. The defendant
3 waives any right to appear telephonically or in person at a hearing, should this
4 Court find a hearing is necessary.

5 3. On March 23, 2022, this Court sentenced Mr. Mares to 96 months'
6 incarceration. ECF No. 79. Mr. Mares was in CHC I with a total offense level of
7 31, which yielded a sentencing guideline range of 108–135 months. Under the
8 amended Guidelines, the parties have determined that Mr. Mares is in CHC I with
9 a total offense level of 29 which yields a guideline range of 87–108 months.

10 4. Consistent with U.S.S.G. § 1B1.10, the parties are proposing Mr.
11 Mares' sentence be amended to 87 months.

12 DATED this 2nd day of May, 2024.

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14 RENE L. VALLADARES
15 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

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17 By /s/ Madeline S. Lal
18 MADELINE S. LAL
19 Assistant Federal Public Defender

 By /s/ Jim W. Fang
 JIM W. FANG
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 United States of America,
4 Plaintiff,

5 v.

6 Francisco Javier Mares,
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8

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ORDER

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10 The Court has considered the parties' proposed resolution and the factors
11 set out in 18 U.S.C. § 3553(a) and under U.S.S.G. § 1B1.10.

12 IT IS THEREFORE ORDERED that the parties' proposed amended
13 sentence is accepted. Pursuant to Second Amended General Order 2023-09, an
14 AO247 form reflecting the amended sentence will be filed.

15 DATED this ____ day of May, 2024.
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18 _____
19 UNITED STATES DISTRICT JUDGE
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